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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada
corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual, and as
the alter ego of News+Media Capital Group
LLC, Las Vegas Review-Journal, Inc., and
Interface Operations LLC dba Adfam;
PATRICK DUMONT, an individual, and as
alter ego of Las Vegas Review-Journal, Inc.,
News+Media Capital Group, LLC, and Interface
Operations LLC dba Adfam; NEWS+MEDIA
CAPITAL GROUP LLC, a Delaware limited
liability company; LAS VEGAS REVIEW-
JOURNAL, INC., a Delaware corporation;
INTERFACE OPERATIONS LLC DBA
ADFAM, a Delaware limited liability company

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Case No. 2:19-cv-01667-ART-VCF

**STIPULATION AND ORDER
REGARDING SEALING
COUNTERDEFENDANT GREENSPUN
MEDIA GROUP, LLC'S RESPONSE TO
DEFENDANTS' OBJECTION TO THE
MAGISTRATE JUDGE'S ORDER**

1 and as alter ego of Las Vegas Review-Journal,
2 Inc., and News+Media Capital Group, LLC; and
DOES, I-X, inclusive,

3 Defendants.

4 LAS VEGAS REVIEW-JOURNAL, INC., a
5 Delaware corporation,

6 Counterclaimant,

7 v.

8 LAS VEGAS SUN, INC. a Nevada corporation;
9 BRIAN GREENSPUN, an individual and as the
alter ego of Las Vegas Sun, Inc.; GREENSPUN
10 MEDIA GROUP, LLC, a Nevada limited
liability company, as the alter ego of Las Vegas
Sun, Inc.,

11 Counterclaim Defendants.

Counterdefendant GREENSPUN MEDIA GROUP, LLC ("GMG"), by and through its counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm, and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and INTERFACE OPERATIONS LLC DBA ADFAM (collectively the "RJ"), by and through their counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, Esq., hereby stipulate and agree as follows:

1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer prior to filing any additional motions to seal. ECF No. 619.

2. On October 17, 2022, Lucy Crow, Esq. on behalf of the Sun, and Mona Kaveh, Esq., on behalf of the RJ, met and conferred regarding sealing relating to Counterdefendant's Response to Defendants' Objection to the Magistrate Judge's Order.

3. The parties agree that the following, and any references thereto, is appropriate for sealing:

- **Exhibit 2:** Excerpts of the transcript of the February 16, 2022, deposition of Robert Cauthorn should be filed under seal because the Sun has designated portions of the transcript "Attorneys' Eyes Only" pursuant to the parties' Protective Order. These portions contain testimony regarding deposition exhibit 215, which is designated "Attorney's Eyes Only." Any portions of the deposition transcript that were not designated "Attorneys' Eyes Only" will be filed publicly.
- **Exhibit 3:** Excerpts of the transcript of the August 15, 2022, deposition of Robert Cauthorn should be filed under seal because the Sun has designated portions of the transcript "Attorneys' Eyes Only" pursuant to the parties' Protective Order. These portions contain testimony regarding deposition exhibit 447 which is designated "Attorney's Eyes Only." Any portions of the deposition transcript that were not designated "Attorneys' Eyes Only" will be filed publicly.

1 DATED this 17th day of October, 2022.

DATED this 17th day of October, 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP

KEMP JONES LLP

3 By: /s/ Marla J. Hudgens

By: /s/ Mona J. Kaveh

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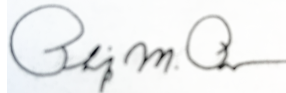
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20 *Attorneys for Plaintiff/Counterdefendants*

21 **IT IS SO ORDERED:**

22 

23 SPECIAL MASTER

24 DATED: October 18, 2022